

DAVID LANDRUM, Oregon State Bar ID Number 955425  
Senior Deputy City Attorney  
Email: [david.landrum@portlandoregon.gov](mailto:david.landrum@portlandoregon.gov)  
DANIEL SIMON, OSB No. 124544  
Assistant Deputy City Attorney  
Email: [dan.simon@portlandoregon.gov](mailto:dan.simon@portlandoregon.gov)  
Office of City Attorney  
1221 SW 4th Avenue, Suite 430  
Portland, OR 97204  
Telephone: (503) 823-4047  
Facsimile: (503) 823-3089  
Attorneys for Defendants

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**JOSEPH WALSH,**

**3:15-cv-01666 SI**

**PLAINTIFF,**

**DECLARATION OF JAMES WOOD**

**v.**

**(In Support of Defendants' Motion for  
Summary Judgment)**

**BRYANT ENGE, CHARLIE HALES,  
CITY OF PORTLAND,**

**DEFENDANTS.**

I, James Wood, declare as follows:

1. I am employed by G4S Security International as an armed Mayor's Security Detail Sergeant. I have held this position since March 2013.
2. My duties including providing security at the entrances and within Portland City Hall and the Portland Building. I also provide security to the Mayor's office and City Council sessions and other Mayor details as assigned.
3. In my experience and observation, individuals visiting City offices, especially City Council sessions, can be very disruptive and engage in inappropriate behavior which can

result in exclusions and possibly arrest. The security of the buildings and its occupants, whether citizens, elected officials or staff, is always the first priority for the security staff.

4. Security officers document the activities which take place in City Hall, the Portland Building and adjacent rights of way. These activities are documented in written reports and video recordings.

5. As part of my employment, I write incident reports documenting security concerns and disruptive and/or inappropriate behaviors.

6. Mr. Joe Walsh is a frequent visitor to City Hall and its adjacent rights of way.

7. Mr. Walsh frequently protests outside City Hall using an amplified "bull horn" to broadcast his opinions.

8. In my experience and observation, Mr. Walsh regularly attends City Council meetings to observe and provide public testimony.

9. Mr. Walsh has a history of being disruptive and combative while attending City Council meetings.

10. I was present at the March 12, 2014 City Council meeting and observed Mr. Walsh's behavior. During that session, Mr. Walsh testified on several agenda items. He became louder and more accusatory to the Mayor and Commissioners each time he testified. Mr. Walsh was warned multiple times to not interrupt, but he continued to do so. Mr. Walsh testified on the last agenda item regarding low income housing. When Mr. Walsh sat down at the presentation table, he banged his cane on the table so it was audible to the back of the room. Mr. Walsh yelled at the Council members, accusing them of misuse of funds, and shouted over Commissioner Fish. After he testified, Mr. Walsh continued to yell from his seat in the spectator section. The Mayor ordered Mr. Walsh out of the Council Chambers and I escorted him out.

11. Attached to this Declaration as Exhibit A is a true and correct copy of the incident report I wrote on March 12, 2014 documenting Mr. Walsh's behavior on that date.

12. I was present at the May 7, 2014 City Council meeting and observed Mr. Walsh's behavior. Mr. Walsh testified regarding revised handicap parking restrictions in downtown Portland. Just prior to Mr. Walsh's testimony, Lisa Frisch had testified providing testimony in favor of the restrictions. When Mr. Walsh sat down at the table, he banged his cane on the table. He immediately became accusatory with the Council and voiced his displeasure for new restrictions. Mr. Walsh's voice was elevated, his face reddened and he appeared to be getting angrier the more he spoke. Mr. Walsh became very argumentative with the Mayor and swore at him. After Mr. Walsh left the Chambers, Ms. Frisch requested an escort from the building.

13. Attached to this Declaration as Exhibit B is a true and correct copy of the incident report I wrote on May 13, 2014 documenting Mr. Walsh's behavior on May 7, 2014.

14. I was present at the September 10, 2014 City Council meeting and observed Mr. Walsh's behavior. Mr. Walsh had spoken in support of one agenda item and attempted to speak on additional agenda items when Mayor Hales stopped him because those statements were scheduled for the following week. Mr. Walsh became extremely upset, boisterous and confrontational. In spite of being directed by both Mayor Hales and Commissioner Fish several times to calm down or leave chambers, Mr. Walsh continued to be disruptive, yelling and slamming his hand onto the conference table at least twice. Eventually, Mayor Hales called a recess to the City Council meeting and directed security to escort Mr. Walsh from chambers. I, with the assistance of other security officers, escorted Mr. Walsh out of chambers. I directed Mr. Walsh to leave the building and informed him he was excluded for 24 hours.

15. Attached to this Declaration as Exhibit C is a true and correct copy of the incident report I wrote on September 10, 2014 documenting in detail Mr. Walsh's behavior on that date.

16. I was present at the May 13, 2015 City Council meeting and observed Mr. Walsh's behavior. I was seated directly across from Mr. Walsh and Steven Entwhistle. Jessie Sponberg was to my left. It appeared to me that these three gentleman were intentionally

antagonizing the Council by yelling statements about stopping the reservoir demolition and actively encouraging audience participation in the yelling. During breaks in the City Council meeting, I observed Walsh, Entwistle and Sponberg collaborating on their efforts to disrupt the meeting. Each time Council reconvened and the Council members attempted to conduct City business, the noise from the audience became deafening with chants to stop the demolition of the reservoirs and loud cascades of “Boo” and “No” all encouraged and directed by Walsh, Entwistle and Sponberg. At one point, Mr. Walsh walked over and laid down on the floor where Constantin Severe was testifying. He rolled up newspapers into a makeshift megaphone and in a loud and boisterous voice yelled “Boos” and “No,” interrupting Mr. Severe’s testimony.

17. Attached to this Declaration as Exhibit D is a true and correct copy of the incident report I wrote on May 20, 2015 documenting in detail Mr. Walsh’s behavior on May 13, 2014.

18. I was present at the July 8, 2015 City Council meeting and observed Mr. Walsh’s behavior. Mr. Walsh requested Agenda Item #743 be pulled from the consent agenda. However, just prior to regular Agenda Item #743, Mr. Walsh had exited the chamber. Since Mr. Walsh was absent, Council moved to the next agenda item and began its verbal presentation. When Mr. Walsh returned to chambers he appeared extremely agitated and started using a very loud and boisterous voice directed at the Mayor and the Commissioners. Mr. Walsh wanted the council to stop the current proceeding and return to Agenda Item #473. When the request was denied, Mr. Walsh stormed up to the conference table, slammed his hand onto it, and in a very loud boisterous voice began arguing his position. Mr. Walsh would not stop screaming and disrupting the City Council session. Mayor Hales declared Mr. Walsh to be trespassing and excluded him from City Hall for 60 days. The City Council meeting was recessed. I approached Mr. Walsh and requested that he leave the building. Outside chambers, Mr. Walsh confronted Mayor’s Chief of Staff Josh Alpert before exiting the building.

19. Attached to this Declaration as Exhibit E is a true and correct copy of the incident report I wrote on July 8, 2015 documenting in detail Mr. Walsh's behavior on that date.

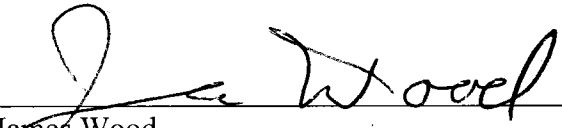
20. A Formal Exclusion letter was given to Mr. Walsh on July 15, 2015.

21. On July 15, 2015, while I was on duty at City Hall's main entrance on SW 4<sup>th</sup> Avenue, Mr. Walsh attempted to enter the building. I informed him that he was trespassing. Mr. Walsh ignored me, walked away and entered the 1<sup>st</sup> floor men's restroom. I called the security supervisor, John Chandler, and informed him of Mr. Walsh's presence in the building.

22. I make this Declaration in support of Defendants' Motion for Summary Judgment.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

DATED: October 26, 2015.

  
James Wood

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DECLARATION OF JAMES WOOD on:

Joseph F. Walsh  
7348 SE Division Street  
Portland, OR 97206  
*Plaintiff-Pro Se*

on October 30, 2015, by causing a full, true and correct copy thereof, addressed to the last-known address (or fax number) of said attorney, to be sent by the following method(s):

- ☒ by **mail** in a sealed envelope, with postage paid, and deposited with the U.S. Postal Service in Portland, Oregon.
- ☐ by **hand delivery**.
- ☒ by **email** pursuant to LR 5-2(b).
- ☐ by **facsimile transmission**.
- ☐ by **email**.

*David Landrum*

---

DAVID LANDRUM, OSB #955425  
Senior Deputy City Attorney  
DANIEL SIMON, OSB No. 124544  
Assistant Deputy City Attorney  
Telephone: (503) 823-4047  
Attorneys for Defendants